

JEFFRY T. NIERMEYER  
DIRECTOR

# SALT LAKE CITY CORPORATION

DEPARTMENT OF PUBLIC UTILITIES  
WATER SUPPLY AND WATERWORKS  
WATER RECLAMATION AND STORMWATER

RALPH BECKER  
MAYOR

AUG 18 2008

August 13, 2008

William O. Moellmer, Ph.D.  
Utah Division of Water Quality  
P.O. Box 144870  
Salt Lake City, Utah 84114-4870



DWQ-2008-001345  
Document Date: 08/13/2008

RE: Proposed Amendments to R317-2, Utah Administrative Code  
Standards of Quality for Waters of the State.

Dear Dr. Moellmer:

Thank you for the opportunity to comment on the revisions to the water quality standards for the State. We appreciate the efforts and the outreach that the State has used in the process of updating these standards.

As a drinking water supplier it is critical to be able to control the quality of the water coming into our plants. The potential for a new discharge above the intake that we have not fully reviewed and had the opportunity to discuss and comment on is very concerning. The best opportunity for this discussion to occur is by including language requiring it in the standards. To accomplish this goal, please consider the attached modifications to the rule section 8 d..

d. Special Procedures for Drinking Water Sources

An Antidegradation Review may be required by the Executive Secretary for discharges to waters with a Class 1C drinking water use assigned, irrespective of whether any of the conditions in Section 3.4 b. applies.

Factors to be considered may include the volume of the discharge compared to the flow of the receiving stream, or where the pollutants discharged may have potentially adverse impact on the drinking water supply.

Depending upon the *proposed* location of the discharge and its proximity to downstream drinking water diversions, **discharge alternatives**, additional treatment, more stringent effluent limits or additional monitoring, beyond that which may otherwise be required to meet minimum technology standards or in stream water quality standards, may be required by the Executive Secretary in order to adequately protect public health and the environment. **The Executive Secretary will include the downstream water treatment facility and the Division of Drinking water in discussion on the potential discharge to determine if there are**

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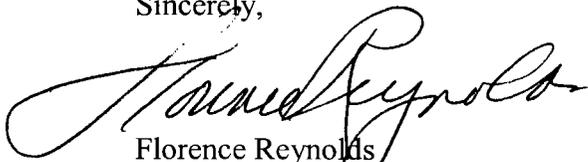
Page 1 of 2

*other discharge options and to help identify any additional treatment deemed appropriate to protect the downstream drinking water supply if the project proceeds. Additional treatment may include alternative disinfection practices, suspended solids removal to make the disinfection process more effective, removal of any specific contaminants for which drinking water maximum contaminant levels (MCLs) exist or are eminent, and/or nutrient removal to reduce the organic content of raw water used as a source for domestic water systems.*

Additional monitoring may include analyses for viruses, Giardia, Cryptosporidium, other pathogenic organisms, and/or any contaminant for which drinking water MCLs exist, **are proposed or eminent**. Depending on the results of such monitoring, more stringent treatment may then be required.

The additional treatment/effluent limits/monitoring which may be required will be determined by the Executive Secretary after consultation with the Division of Drinking Water and the downstream drinking water users.

Sincerely,



Florence Reynolds  
Water Quality and Treatment Administrator  
Salt Lake City Public Utilities